



VIA ELECTRONIC FILING

Tuesday, January 19, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: ET Docket No. 04-186

Dear Ms. Dortch:

Great American Broadband (GAB) is an integrated Wireless Internet Service Provider (WISP) serving thousands of broadband customers in rural communities across Indiana, Ohio, Nebraska and Wyoming. In many communities, GAB is the only broadband service provider. In many others, GAB is the only alternative service provider to an incumbent phone or cable company.

The areas we serve appear to have significant TV bands “white space” spectrum, and GAB is actively researching how to reach new customers with innovative wireless services using the TV bands. In considering site selection and service coverage areas one concern keeps coming up for us. Specifically: the technical details of our wireless infrastructure could find their way to competitors as we activate new, unlicensed “Fixed” TV band radios.

“Fixed” device locations must synchronize among TV band databases, and inadvertent release of contact information could expose a company’s wireless infrastructure to early competition or security risk.¹ While the Rules prevent a complete solution to this problem, we believe they allow synchronization of “sanitized” technical detail. We like how Key Bridge addresses the practical business concerns of confidentiality in their proposal, and we hope other administrators will follow Key Bridge’s example and assure the protection of sensitive commercial data.²

¹ See 47 CFR 15.715(k) and 15.713(b)(2)(d), which require synchronization of identifying and location information of Fixed TVBDs.

² See *Key Bridge Global LLC, Proposal to Administer a TV Bands Database* at 157

TV bands are a new wireless resource, and their deployment may become quite complicated, involving multi-channel wireless networks to avoid overlapping geographic protected contours. Companies like ours will require a business partnership with TV band administrators. It is likely we will need their support throughout the planning, commissioning, testing and activation phases of wireless network deployment, and we hope they will develop tools and technologies to simplify these activities.

GAB is skeptical of proposals that claim to offer free service. In our view, “Free” implies the applicant sees no direct value in the service and must subsidize it to from other lines of business or they expect a hook to other, more expensive services. Regardless, “free” TV bands will likely come with “free” support and “free” infrastructure: i.e. very poor to none at all. Alternatively, as is common practice with software, “free” TV bands could require expensive support contracts. The Commission should share our skepticism.

GAB hopes eventually to contract with an administrator that will support our TV band services, infrastructure, and ultimately our customers. Great American Broadband is impressed with the thoroughness of the Key Bridge proposal and their apparent understanding of real-world operational requirements, their embrace of open standards and support of interoperability testing.³ We are especially pleased to see their consideration of the two issues we believe are most important for initial TV bands adoption among the Wireless ISP community: information security and customer support.

Lastly, GAB wholeheartedly agrees with Commissioner McDowell that the TV bands database administrator should be a “neutral third party.”⁴

Very best regards

/s/

Robert L. Schmidt, Chairman/CEO
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³ See *Key Bridge Global LLC, Proposal to Administer a TV Bands Database* at 159

⁴ See *The Washington Post* “FCC’s McDowell on broadband plan, white spaces, Google as administrator” http://voices.washingtonpost.com/posttech/2010/01/fcc_mcdowell_on_broadband_plan.html